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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF PATRICK
SCHMIDT IN SUPPORT OF PLAINTIFF
WAYMO LLC'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF ITS RESPONSE TO
DEFENDANTS' BRIEFS REGARDING
LEVANDOWSKI'S ADVERSE
INFERENCES**

I, Patrick Schmidt, declare as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Waymo's Administrative Motion to File Under Seal portions of its July 14 Response to Defendants' Briefs Regarding Levandowski's Adverse Inferences (the "Response"), filed concurrently herewith (the "Administrative Motion"). The Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Response	Highlighted Portions	Defendants

3. The highlighted portions of Waymo's Memorandum contains references to information that Defendants have designated as confidential and/or highly confidential.

4. Waymo expects Defendants to file one or more declarations in accordance with the Local Rules.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct, and that this declaration was executed in Los Angeles, California, on July 14, 2017

By /s/ Patrick Schmidt
Patrick Schmidt
Attorney for WAYMO LLC

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Patrick Schmidt.

/s/ Charles K. Verhoeven
Charles K. Verhoeven